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May 16, 2002

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Docket to Determine the Compliance of BellSouth
Telecommunications, Inc.'s Operations Support Systems with State
and Federal Regulations*
Docket No. 01-00362

Dear Mr. Waddell:

Enclosed are the original and thirteen copies BellSouth's *Notice of Supplemental Authority*.

Copies are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations*

Docket No. 01-00362

NOTICE OF SUPPLEMENTAL AUTHORITY

BellSouth Telecommunications, Inc. ("BellSouth") hereby files this supplement to the record in the above-styled docket based on the May 15, 2002 release of the *Memorandum Opinion and Order*, CC Docket No. 02-35, In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana (hereinafter the "Georgia/Louisiana Order"). In the Georgia/Louisiana Order, the FCC approved BellSouth's application for Section 271 InterLATA authority in both Georgia and Louisiana. In so holding, the FCC made the following findings that are relevant to the decision pending before the Authority in this matter, and support BellSouth's position. These findings are as follows:

- "the Georgia Commission provided for extensive third-party testing of BellSouth's operations support systems (OSS) offerings." *Georgia/Louisiana Order*, ¶ 2 (emphasis added).

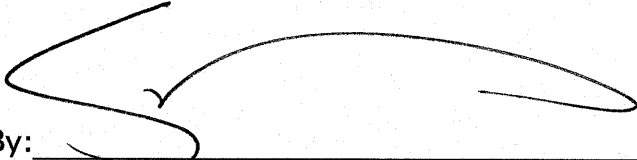
- "we find that the results of KPMG's test in Georgia provide meaningful evidence that is relevant to our analysis of BellSouth's OSS. We also note that BellSouth does not rely on the results of the KPMG test alone, but also relies on evidence of significant commercial usage in Georgia." *Georgia/Louisiana Order*, ¶ 108.
- "We conclude that BellSouth, through the PwC review and other aspects of its application, provides sufficient evidence that its electronic processes are the same in Georgia and Louisiana. In conducting its review, PwC examined the consistency of applications and technical configurations used to process pre-ordering and ordering transactions region-wide, and reviewed the consistency of documentation of systems and processes in BellSouth's local carrier service center. PwC observed transactions, reviewed user guides, performed change control review, and interviewed relevant BellSouth service representatives in making its determination that BellSouth's OSS systems for pre-ordering and ordering are identical. PwC also reviewed the consistency of Local Service Requests (LSRs) for order entry, LSR screening and validating procedures, and various servicing processes to conclude that there is 'no material difference in functionality or performance' between DOE and SONGS. In addition to PwC's review, the record indicates that the BellSouth OSS for pre-ordering and ordering functions does not distinguish between Georgia and Louisiana." *Georgia/Louisiana Order*, ¶ 110 (footnotes omitted). (emphasis added.)
- "We reject competitive LEC claims that BellSouth's OSS are not the same in Georgia and Louisiana. The record indicates that the PwC examination closely modeled the successful "Five State Regional OSS Attestation Examination" performed in the context of SWBT's Kansas/Oklahoma Section 271 application and BellSouth has provided detailed information regarding the "sameness" of BellSouth's systems in Georgia and Louisiana, including their manual systems and the way in which BellSouth personnel do their jobs. Accordingly, we find that BellSouth, through the PwC audit and its attestation examination, provides evidence that its OSS in Georgia are substantially the same as the OSS in Louisiana. We shall consider BellSouth's commercial OSS performance in Georgia and the Georgia third-party test to support the Louisiana application and rely on Louisiana performance to support the Georgia application. In addition, because the OSS are the same in both states, where low volumes in one state yield inconclusive or inconsistent information concerning BellSouth's compliance with the competitive checklist, we can examine data reflecting BellSouth's performance in another state." *Georgia/Louisiana Order*, ¶ 111 (footnotes omitted).

- "WorldCom claims, for example, that it has 'suspicions that there are important back-end different system differences across BellSouth's region' due, in part, to BellSouth's plans to implement a single order process in only select states. WorldCom also notes that orders formatted in a certain way (without an asterix as part of an address) flow through in Georgia but not Louisiana. Aside from noting that BellSouth grew out of a merger of Southern Bell and South Central Bell, and concluding that BellSouth's implementation plan is 'extremely odd.' WorldCom does not offer any specific support for its suspicions." *Georgia/Louisiana Order*, ¶ 111, fn. 368.

BellSouth respectfully requests that the Authority add the entire Georgia/Louisiana Order to the list of decisions of which it took judicial notice during the hearing.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.


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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2002, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

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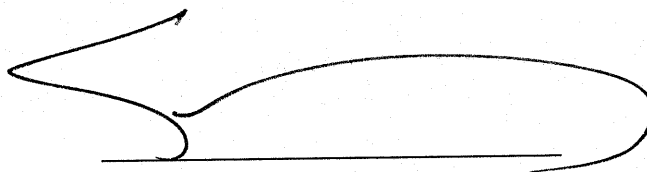
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A handwritten signature in black ink, appearing to read "Terry Monroe". The signature is written in a cursive style with a large, sweeping loop at the end.